



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY


WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

April 24, 2020

MEMORANDUM

SUBJECT: Guidance on Key Off-Site Compliance Monitoring (OfCM) Activities and National Reporting

FROM: David Hindin, Director 
Office of Compliance

TO: Enforcement and Compliance Assurance Division Directors, Regions I-X
OECA Office Directors

EPA has historically conducted off-site compliance monitoring but has not had consistent national reporting for these activities. This hinders our ability both to understand the use/value of this tool and to respond to recent Congressional requests for separate information on our off-site compliance monitoring versus inspections. With the COVID-19 public health emergency severely constraining our ability to perform on-site inspections, we have decided to increase our use of a defined set of key off-site compliance monitoring (OfCM) activities (hereafter Key OfCM Activities). Further, we will nationally report all Key OfCM Activities conducted from April 1, 2020, through September 30, 2020. The Key OfCM Activities categories for national reporting are explained and set forth in the attached Guidance. Regions may continue to report other OfCM activities as they wish.

As set forth in the Guidance, starting in FY2020 we will only count activities as inspections when an EPA credentialed inspector was on-site. In contrast, if an EPA credentialed inspector is not on-site but is working with another federal agency that is on-site we will count this as EPA off-site compliance monitoring. This change is effective for all of FY 2020 and all compliance monitoring activities that were entered in ICIS as an inspection but for which there was not an EPA credentialed inspector on-site, should be corrected to the appropriate OfCM activity.

We appreciate the input we received from you and your staffs on drafts of this Guidance over the past few weeks. If you have any questions regarding the Guidance, please contact Randy Hill, Director, Enforcement and Targeting Data Division, or Jason Swift, Chief, ICIS Customer Support Section, in the Office of Compliance.

Attachment

cc: OC Division Directors
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Guidance on Key Off-Site Compliance Monitoring (OfCM) Activities and National Reporting

Office of Compliance

April 24, 2020 Final

Overview

EPA has historically conducted off-site compliance monitoring but has not had consistent national reporting for these activities. This hinders our ability both to understand the use/value of this tool and to respond to recent Congressional requests for separate information on our off-site compliance monitoring versus inspections. With the COVID-19 public health emergency severely constraining our ability to perform on-site inspections, we have decided to increase our use of a defined set of **key off-site compliance monitoring (OfCM) activities (hereafter Key OfCM Activities)**. Further, we will nationally report all of our Key OfCM Activities conducted from April 1, 2020, through September 30, 2020. The Key OfCM Activities categories for national reporting are set forth in the table below. Regions may continue to report other OfCM activities as they wish.

In reporting the Key OfCM Activities described in this Guidance (listed in the **Key OfCM Types** column), Regions should review the information in the **Program Description** and **ICIS CM Activity Type, and CM Type and Code** columns to ensure a consistent understanding of what is a Key OfCM Activity and what is not.

This is a pilot for the remainder of FY 2020 and we may refine and continue it in FY 2021 as OfCM activities could be of growing importance to our program.

Expectations

OECA expects EPA Regions will increase the number of Key OfCM Activities that they conduct during the current public health emergency compared to normal times.¹ In addition, regions are encouraged to focus their OfCM work on the following:

- identifying and addressing *on-going* noncompliance;
- where targeting and/or violation prioritizing data is available, focusing OfCM on the most serious violations (e.g., the SNC NCI);
- focusing evaluations on locations with known air or water pollution issues, especially in areas with air pollution problems that may affect respiratory health; and
- advancing NCI work.

Instructions for Reporting

1. We recognize that the lines between OfCM, targeting and investigations are not always bright lines, and so we have tried to explain the differences. **The key definitional criterion for an OfCM activity is that EPA reviews information that is sufficiently detailed to form a reasonable view of a facility's compliance status with respect to a requirement, without entering the facility.**

¹ We recognize that our historical national data on OfCM is incomplete and not consistent, and with the many changes we are making now to improve consistency, simple comparisons of FY 2020 to prior years for OfCM will be difficult.

2. **In some places, we are changing historical practices for tracking and reporting OfCM.** We are doing this now to create more consistency and brighter lines for OfCM and knowing that past practices were neither uniformly understood nor implemented.
3. **Regions should enter all Key OfCM Activities they complete between April 1, 2020, and September 30, 2020.** Regions may continue to enter Key OfCM Activities that occurred prior to April 1 or other OfCM work as they wish.
4. **The Key activity types (i.e., rows in the table below) overlap for some types of OfCM and Regions should report any particular OfCM activity only once to ICIS or other database of record identified. Please do not create duplicate entries for the same OfCM activity.**
5. **Regardless of the amount of effort the Region spends to conduct an OfCM activity for a facility** (e.g., if the Region reviews 10, 25, or 100 pages of materials), **only one OfCM activity should be reported** for that facility. This guidance recognizes that Regions need not report on de minimis OfCM activities (e.g., spending less than 2 hours on review of a single document that does not result in a compliance determination or follow-up).
6. When entering into ICIS or other database of record an off-site record review, please **use the date the OfCM activity is completed as the date the activity occurred.** That is the date **the activity is no longer enforcement sensitive**, and that is the date that should be entered. In most cases in ICIS, this date is **reported as the Actual End Date.** For **CAA Stack Test Reviews**, the date the test report is reviewed is entered as **the “Date Test Results Were Reviewed.”** When a Region reviews a title V annual compliance certification, the date of the review is reported as the Reviewed On date on the TV ACC Review table of the **TV ACC compliance monitoring record.** We do not need a start date to be entered, and the start date may be hard to know until the end date happens.
7. For OfCM involving an **activity occurring in Indian Country**, please report that information in ICIS; use the “Tribal Land” field on the “Location Information” section of the Facility Basic Info screen to identify the Tribal Land.
8. Only count activities as inspections if an EPA credentialed inspector was on-site. Some EPA off-site compliance monitoring involves an inspector or agent from another federal agency that is on-site providing EPA with observations and information, such as photos, recorded videos or live audio video conversations. **We will count and report when EPA works with another federal agency** (such as Customs or the Coast Guard), but we will not count it as an EPA inspection since there is not an EPA credentialed inspector on-site. Instead, **regions and OECA will get credit for this important work as off-site compliance monitoring.** This change is effective for all of FY 2020 (not just starting April 1, 2020) and **all compliance monitoring activities that have been entered into ICIS as an inspection but for which there was not an EPA credentialed inspector on-site, should be corrected to the appropriate OfCM activity.**

Key Definitions

An **off-site compliance monitoring** (OfCM) activity has these critical features:

1. An EPA credentialed inspector is **not on-site**.
2. An EPA inspector, or other EPA employee with sufficient knowledge, training, or experience to assess compliance², reviews information that is sufficiently detailed to form a reasonable view as to the compliance status of a specific facility without entering the facility. Such information may include:
 - a. Review of images EPA took itself or acquired from another entity on aerial photography, satellite images, infrared cameras mounted on aircraft, GMAP, or another remote monitoring activity;
 - b. Monitoring, sampling and/or reporting by an authorized/delegated state, tribe or local government, including a referral from such government for EPA to take an enforcement action;
 - c. Self-monitoring, sampling and reporting performed by the facility (including its contractors, labs or other third parties); or
 - d. Monitoring, sampling and/or reporting by a citizen or NGO that is deemed credible.
3. The result of the OfCM could be the decision that there are violations (or likely violations) that should be pursued with an inspection, information request, or enforcement action (separately tracked in ICIS); or that there are unlikely to be violations worth further EPA attention.

An **inspection** is a compliance monitoring activity that:

1. Is conducted by **an EPA-credentialed inspector**, and
2. Is performed **on-site**, at a regulated facility or other field location,³ and
3. Collects information or samples, and
4. Is conducted for the purpose of determining compliance with applicable environmental requirements (e.g., permit conditions, regulations, administrative, and judicial agreements or orders), and
5. The observations of the inspector(s) are captured in an inspection report⁴ and communicated in writing with the facility consistent with OECA's June 2018 Interim Policy on Inspection Report Timeliness and Standardization and the June 2019 OC memo on Compliance Monitoring Activities that Require a Civil Inspector Credential, and
6. Follows the February 2020 EPA Inspection Procedures Rule.

Note: While we have occasionally used the phrases *remote inspection* or *off-site inspection*, we are no longer using those phrases and those activities will be tracked and reported in our Annual Results instead as OfCM activities.

² See June 2019 Office of Compliance memorandum on Compliance Monitoring Activities that Require a Civil Inspector Credential that indicates the inspector credential not required for offsite compliance monitoring activity.

³ "Field location" may include, for example, locations that are not part of a facility where upstream or downstream water or air sampling is conducted, or a retail establishment that markets regulated products, or a warehouse or port that hold regulated products for import.

⁴ Depending on the statutory program, a check-list inspection report may suffice.

An **investigation** is a compliance monitoring activity that:

1. Involves a detailed assessment of a regulated entity's compliance status over days or a longer period, and requires significantly more time to complete than a typical inspection;
2. May include extensive file reviews and responses to citizen tips and complaints;
3. Will normally include multiple OfCM activities.

Investigations have been entered into ICIS for a long time and we report them in our Annual Results as part of Compliance Monitoring Activities. We typically do around 100 investigations per year, primarily in CAA.

Targeting is data analysis or area screening using criteria, factors and data looking across multiple facilities that may be suggestive of possible violations at specific facilities. Targeting is **not** off-site compliance monitoring, as it is not sufficiently detailed to form a reasonable view as to the compliance status of a specific facility. Targeting includes, for example, data evaluation using tools in ECHO, visual drive-bys for multiple facilities, the use of the GMAP vehicle to drive around numerous sites, or IR camera flyovers. In contrast:

- If the GMAP vehicle stops and an inspector enters the facility, then that is likely to be an inspection.
- The Region supplements the GMAP or aerial imagery with reviews of permits and other reports about the facility, then that is likely to be an OfCM.
- If targeting identifies one or more facilities with possible instances of non-compliance, and the Region then dives deeper into gathering and analyzing other information to form a reasonable view on compliance for a particular facility (such as reviewing permits, calling the authorized state/tribe/local government), then this becomes an OfCM activity for that facility.

Information request letters have been classified as case development activities and while they have features of compliance monitoring, OECA has not included them in the Annual Results count of Compliance Monitoring activities (which includes primarily inspections and a subset of off-site compliance monitoring). **Review of records received in response to an information request letter is considered an OfCM activity.**

Examples of Activities which are NOT OfCM

1. **Inspections** (see above).
2. **Investigations** (see above). When reporting an investigation in ICIS, select "Investigation" as the Compliance Monitoring Activity type and not "Inspection/Evaluation" or "Offsite Record Review." Once the enforcement team determines that its evaluation of the regulated entity has become an investigation, do not continue reporting the individual OfCM activities. There is no need to go back and remove prior individual OfCM activities once the investigation has been initiated and entered into ICIS.
3. **Targeting** (see above).
4. **Information request letters** (see above).
5. **Consent Decree (CD) oversight activities.** Although the Compliance Monitoring Strategies for CAA Stationary Source and NPDES describe review of a CD deliverable (such as a progress report) as an OfCM activity, regions have not consistently reported such reviews. ICIS tracks overall monitoring of three key CDs milestones (penalty payment, SEP completion and completion of injunctive relief requirements) as part of the final enforcement order module. OECA has a separate workgroup

underway to improve tracking of CD oversight in ICIS, and will also look to amend the Compliance Monitoring Strategies accordingly.

6. **Case Development.** Although OfCM activities and/or an investigation may be elements of case development (and will be tracked per this guidance), case development itself is not tracked in ICIS as separate activity.
7. **State oversight** (e.g., retrospective audits of the state’s inspection reports or real-time review focused on state program implementation).
8. **Compliance assistance** via webinars, training, or on-site visits.
9. **SDWA Public Water System Sanitary Surveys** (which are compliance assistance). Reviews of Sanitary Survey reports as part of a retrospective program review but not immediate addressing actions are state oversight and would not be OfCM. In contrast, EPA off-site **review of a specific sanitary survey report, deficiencies, and other information related to compliance at the drinking water system would be an off-site compliance monitoring activity.**

Table of Key Off-Site Compliance Monitoring Types with Data Entry Instructions

QUICK LINKS TO KEY OFF-SITE COMPLIANCE MONITORING (OfCM) TYPES (SEE FULL TABLE ON PAGES 7 TO 12)						
<u>Aerial photography or satellite data or infrared images in any program</u>	<u>CAA Annual Title V report review</u>	<u>CAA Off-Site PCE</u>	<u>CAA Stack Test Reviews</u>	<u>CWA Desk Audits</u>	<u>CWA FRP review</u>	<u>FIFRA, TSCA or EPCRA Record Reviews</u>
<u>Import evaluations under CAA Title II, FIFRA, or TSCA</u>	<u>Information Request Responses</u>	<u>RCRA Financial & Non-Financial Record Reviews</u>	<u>RCRA UST partial compliance determinations</u>	<u>RMP plan reviews for 112(r)</u>	<u>SDWA Public Water System Desk Audits</u>	

Key Off-Site Compliance Monitoring Types with Data Entry Instructions To accurately report the Key OfCM activity, select the correct Compliance Activity Type (e.g., Inspection/Evaluation), and report the: Statute, Law Section, Compliance Monitoring Type, and Actual End Date (i.e., last day of activity) in addition to other system required fields, which are marked with an * in ICIS.			
#	Key OfCM Types	Program Description	ICIS CM Activity Type, and CM Type and Code ⁵
1.	CAA Off-Site Partial Compliance Evaluations (PCEs)	<p>Examples of Off-site PCEs include: comparing emission inventory data to a facility's permit and its other reports and review and evaluation of a facility's NSPS/NESHAP reports. Note that FLIR Flyovers are, by themselves, targeting activities, but, if combined with additional facility record reviews, should be tracked as off-site PCE's. Note: there are on-site PCEs which are counted as inspections.</p> <p>Even if a Region reviews multiple reports in a single fiscal year for the same regulatory requirement, it should only enter one PCE based on its review of the first report in the fiscal year. If, later in the year, the Region reviews a report for a different regulatory program (e.g., different MACT), the Region may, if it wishes, enter another PCE. And such reviews should not involve simply scanning the submitted report, but should include a detailed review as set forth in the definition of an OfCM activity.</p> <p>For CAA minor sources in which the off-site PCE is done very quickly (e.g., less than two hours) and the facility is not in ICIS since it is a minor, the data entry burden may not be worth it. But if the quick review does find potential violations that need to be addressed, then please do enter the PCE as an OfCM activity.</p>	<p>Inspection/Evaluation "PCE Off-Site" (PFF)</p> <p><i>Note: If a facility with an ICIS-Air Programmatic ID exist, it should be used. If one does not exist, then one should be created by adding an "Air Facility" and selecting the Region as the first two characters of the ID.</i></p>

⁵ Compliance Monitoring Activities are entered into ICS either as Inspections/Evaluations, Off-Site Record Reviews, Information Requests, or Investigations. For each Off-Site activity listed in this table, this column indicates whether it is an Inspection/Evaluation or Off-Site Record Review, and the ICIS compliance monitoring type description and code.

Key Off-Site Compliance Monitoring Types with Data Entry Instructions To accurately report the Key OfCM activity, select the correct Compliance Activity Type (e.g., Inspection/Evaluation), and report the: Statute, Law Section, Compliance Monitoring Type, and Actual End Date (i.e., last day of activity) in addition to other system required fields, which are marked with an * in ICIS.			
#	Key OfCM Types	Program Description	ICIS CM Activity Type, and CM Type and Code ⁵
2.	CAA Stack Test Reviews ⁶	EPA review of stack test or performance test results.	Inspection/Evaluation “Stack Test” (CST) Considered Off-Site if the Stack Test is <u>not</u> observed by the EPA. The date of the stack test is reported in the “Actual End Date” field. The date the results are reviewed must be entered in the “Date Test Results Were Reviewed” field, in addition to the results/status of the test (Pass/Fail).
3.	CAA Annual Title V report review	Review of a facility's Title V annual compliance certification, including if deviations are reported by the facility. These are separately tracked from the general CAA off-site PCEs (see item 1 above). Please avoid double counting.	Inspection/Evaluation “TV ACC Receipt/Review” (TVA) There are three dates needed for a TV ACC: Due Date (Planned End Date), Received Date (Actual End Date), and Reviewed date (Reviewed On). The Review is a child record to the Due/Received CM record. The Reviewed On date, Reviewer Agency and if the facility reported deviations (Yes/No) must be reported.

⁶ Stack Tests that evaluate compliance are included in Annual Results. These are Stack Tests where the Stack Test Purpose is *blank* or the Stack Test Purpose = Agency Priority, Citizen Complaint/Tip, Case Development, Core Program, For Cause, Other, Oversight, Parametric Monitoring for 40 CFR Part 64, Performance Test Demonstrating Compliance (National Reporting), Random Inspection, SIP Compliance Tests (State Only Rules), Selected Monitoring Action, or Voluntary Testing.

Key Off-Site Compliance Monitoring Types with Data Entry Instructions To accurately report the Key OfCM activity, select the correct Compliance Activity Type (e.g., Inspection/Evaluation), and report the: Statute, Law Section, Compliance Monitoring Type, and Actual End Date (i.e., last day of activity) in addition to other system required fields, which are marked with an * in ICIS.			
#	Key OfCM Types	Program Description	ICIS CM Activity Type, and CM Type and Code ⁵
4.	Review of aerial photography or satellite data or infrared images in any program	Review of these images supplemented with other detailed information may reveal, e.g., possible: <ul style="list-style-type: none"> Deteriorating conditions in wastewater treatment plants, e.g., solids and algae buildup in clarifiers, septic conditions (based on color) in treatment systems, and accumulated solids by outfalls. Unpermitted hazardous waste sites through the presence of dead or dying vegetation. Changes over time which may show unauthorized landfills. Infrared photos which identify the location of unpermitted industrial discharges (including thermal discharges). 	<p>If this review is NPDES related, it should be reported to ICIS as an Offsite Record Review - "Desk Audit" (DSA) (see also item 7 below).</p> <p>If this review is CAA stationary source related, it should be reported to ICIS as an Inspection/Evaluation - "PCE Off-site" (PFF).</p> <p>If this review is related to hazardous waste, it should be reported to RCRAInfo as a "Non-financial Record Review" (NRR). If this review is <u>not</u> related to hazardous waste, it should be reported to ICIS as an Offsite Record Review - "Non-Financial Record Review" (NFR).</p>
5.	RCRA Financial and Non-Financial Record Reviews	Includes RCRA Coal Combustion Residual (CCR) facility reporting requirements, Biennial Reporting System (BRS) reports, and e-Manifest compliance reviews (as Non-Financial Record Reviews).	<p>If this review is related to hazardous waste, it should be reported to RCRAInfo as a "Financial Record Review" (FRR) or a "Non-financial Record Review" (NRR). If this review is <u>not</u> related to hazardous waste it should be reported to ICIS as an Offsite Record Review - "Financial Record Review" (FRR) or "Non-Financial Record Review" (NFR).</p> <p><i>Note: The official counts of RCRA Hazardous Waste Record Reviews for Annual Results are retrieved from RCRAInfo not ICIS. Do not report the same record review to both databases to avoid double counting.</i></p>

Key Off-Site Compliance Monitoring Types with Data Entry Instructions To accurately report the Key OfCM activity, select the correct Compliance Activity Type (e.g., Inspection/Evaluation), and report the: Statute, Law Section, Compliance Monitoring Type, and Actual End Date (i.e., last day of activity) in addition to other system required fields, which are marked with an * in ICIS.			
#	Key OfCM Types	Program Description	ICIS CM Activity Type, and CM Type and Code ⁵
6.	FIFRA, TSCA or EPCRA Record Reviews (paper, website, electronic)	<p>Includes FIFRA, TSCA and EPCRA threshold/data reviews, such as FIFRA reviews that may reveal violations for unregistered pesticides or false pesticide claims. In contrast, if EPA is on-site looking at the product in a store, warehouse or at a port of entry, this would be an inspection.</p> <p>For the lead paint and repairs renovation program, this includes review of sales materials and home renovation shows.</p> <p><i>Note: since FY 2017, EPCRA 313 Offsite Record Reviews have been required ICIS reporting and have been included as "Compliance Monitoring Activities" in OECA's Annual Results. This guidance does not change that expectation, but instead expands the scope of EPCRA record reviews subject to reporting.</i></p>	<p>Offsite Record Review "Desk Audit" (DSA), "Financial Record Review" (FRR), "Non-Financial Record Review" (NFR) or "Management Plan" (MTP) for TSCA;</p> <p>"Desk Audit" (DSA), "Financial Record Review" (FRR), "Non-Financial Record Review" (NFR), "Ecological Effects Data Audit" (EEA), or "Health Effects Data Audit" (HEA) for FIFRA;</p> <p>"Data Audit" (DAT) for EPCRA</p>
7.	CWA Desk Audits	A comprehensive off-site compliance evaluation of data, records, and facility reports to make a facility-level or program-level (for pretreatment and MS4s) compliance determination. May include review of agency-gathered testing, sampling and ambient monitoring data; compliance deliverables submitted pursuant to permits and administrative enforcement actions; and analysis of remote sensing, aerial or satellite images. Facility-level records may include DMRs and annual reports, conversations with facilities, and tips and complaints. (Source: NPDES CMS.)	<p>Offsite Record Review "Desk Audit" (DSA)</p>
8.	CWA Facility Response Plan (FRP) review	<p>Review of FRP plans for facilities covered under 40 CFR Part 112.</p> <p>FRP Plans are required to be submitted to the EPA and should be reviewed. Those plans from facilities that are deemed significant and substantial harm facilities must be reviewed every 5 years. Regions should take this opportunity to complete these reviews.</p> <p><i>Note: Because SPCC Plans are not required to be submitted to EPA, we are not including them here as Key Offsite Compliance Monitoring. But if EPA obtains an SPCC plan for review, e.g., through a response to a CWA 308 request, please report to the Oil Database as described under item #9 below.</i></p>	<p>Review of FRP plans are reported to the Oil database using the "Plan Reviews" Activity Type, and the FRP Plan Review Activity Subtype. The date reported should reflect the date the review is completed.</p> <p><i>Note: The Oil database is the database of record for these offsite compliance monitoring activities.</i></p>

Key Off-Site Compliance Monitoring Types with Data Entry Instructions To accurately report the Key OfCM activity, select the correct Compliance Activity Type (e.g., Inspection/Evaluation), and report the: Statute, Law Section, Compliance Monitoring Type, and Actual End Date (i.e., last day of activity) in addition to other system required fields, which are marked with an * in ICIS.			
#	Key OfCM Types	Program Description	ICIS CM Activity Type, and CM Type and Code ⁵
9.	Review of Information Request Responses (several programs)	Review of responses to informal information requests or Information Request Letters sent under any appropriate statutory provision (e.g., CAA 114/208, CWA 308, RCRA 3007, etc.). <i>Note: sending the information request is tracked as a separate activity in ICIS.</i>	Offsite Record Review “Desk Audit” (DSA) for CWA NPDES (CWA 308) related reviews If a CWA SPCC Plan is received in response to a CWA 308 Information Request Letter, the plan review is reported to the Oil database using the “Plan Reviews” Activity Type, and the SPCC Plan Review Activity Subtype. “Financial Record Review” (FRR) or “Non-Financial Record Review” (NFR) for CAA mobile sources (CAA 208), FIFRA, SDWA, and TSCA. “Data Audit” (DAT) for EPCRA If this review is related to RCRA hazardous waste, it is reported to RCRAInfo as a “Financial Record Review” (FRR) or “Non-financial Record Review” (NRR). If this review is not related to hazardous waste, it is reported to ICIS as a Offsite Record Review - “Financial Record Review” (FRR) or “Non-Financial Record Review” (NFR). Inspection/Evaluation “PCE Off-Site” (PFF) for CAA Stationary Source (CAA 114) <i>Note: Regions should include “Information Request Review” in the Compliance Monitoring Activity Name.</i>

Key Off-Site Compliance Monitoring Types with Data Entry Instructions To accurately report the Key OfCM activity, select the correct Compliance Activity Type (e.g., Inspection/Evaluation), and report the: Statute, Law Section, Compliance Monitoring Type, and Actual End Date (i.e., last day of activity) in addition to other system required fields, which are marked with an * in ICIS.			
#	Key OfCM Types	Program Description	ICIS CM Activity Type, and CM Type and Code ⁵
10.	Import evaluations under CAA Title II, FIFRA, or TSCA	<p>Includes EPA review of information provided by another agency, such as Customs, where the other agency requests an EPA decision on whether a product (such as an engine or a pesticide) should be allowed into commerce.</p> <p>Even if a Customs or other federal government inspector is on-site looking at the questionable goods (e.g., the goods are in the possession of Customs), this is still counted as off-site compliance monitoring since there is no credentialed EPA inspector on-site.</p>	<p>Inspection/Evaluation “Motor Vehicle/Engine – Off-Site” (CVF) for CAA Title II;</p> <p>Offsite Record Review “Desk Audit” (DSA), “Financial Record Review” (FRR), or “Non-Financial Record Review” (NFR) for TSCA;</p> <p>“Desk Audit” (DSA), “Financial Record Review” (FRR), “Non-Financial Record Review” (NFR), “Ecological Effects Data Audit” (EEA), or “Health Effects Data Audit” (HEA) for FIFRA</p>
11.	RMP plan reviews for 112(r)	Review of RMP plans describing the potential effects of an accidental release, accident history, evaluation of worst-case and alternatives, and emergency response programs.	<p>Inspection/Evaluation “112(r) Inspection - RMP Non-Filer Review Off-Site” (RMF)</p> <p>For other 112(r) plan reviews, report to ICIS a “PCE Off-Site” (PFF).</p> <p><i>Note: Be sure to select the 112(r)(7) Law Section.</i></p>
12.	SDWA Public Water System Desk Audits	Review of PWS related data and reports, such as: sampling and monitoring data, responses to information requests, sanitary survey reports, follow-up on significant deficiencies, inspection reports, compliance deliverables submitted pursuant to permits or otherwise, annual reports, conversations with primacy agencies about specific systems or facilities, tips and complaints or other information for the purpose of identifying noncompliance.	Offsite Record Review “Desk Audit” (DSA)
13.	RCRA UST partial compliance determinations	Includes compliance determination for tank and piping release detection, annual ALLD testing, CP inspection and testing, and financial responsibility; would not include review of spill and overflow obligations.	Inspection/Evaluation “Financial Record Review” (FRC) or “Non-Financial Record Review” (NFC)

General questions on this guidance should be directed to the Office of Compliance’s Enforcement and Targeting Data Division, either Randy Hill, Director, at hill.randy@epa.gov, or Jason Swift, Chief, ICIS Customer Support Section, at swift.jason@epa.gov. Specific questions about data entry should be sent to the ICIS Help Desk at ICIS@epa.gov.